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December 3, 2021

ECF

Honorable Loretta A. Preska, U.S.D.J.
United States Courthouse
500 Pearl Street, Room 2220
New York, New York 10007

Re: *Amy Miller v. Levi & Korsinsky, LLP, Eduard Korsinsky and Joseph Levi*
Civil Action No. 1:20-cv-01390-LAP-BCM

Dear Judge Preska:

We represent defendants Levi & Korsinsky, LLP (“L&K”), Eduard Korsinsky (“Korsinsky”) and Joseph Levi (“Levi”) (collectively, “Defendants”) in the above-referenced matter. As directed by Your Honor, we write jointly with Plaintiff Amy Miller (“Plaintiff”) to advise the Court that the parties met and conferred on the afternoon of December 1, 2021 to discuss a revised proposed schedule by which the parties will complete discovery. The parties jointly propose the following revised discovery schedule:

1. Plaintiff is to complete her ESI production by December 17, 2021, and Plaintiff’s production of documents other than those produced as ESI production, initially stated in Plaintiff’s Responses and Objections to Defendants’ First Request for the Production of Documents to be produced within 30 days of October 28, 2021, is now to be completed promptly but not later than December 17, 2021.
2. Defendants will produce discovery responses to compensation information sought in Plaintiff’s First Set of Interrogatories and Plaintiff’s First Request for Production of Documents by December 17, 2021.
3. The parties will work in good faith to resolve outstanding discovery disputes. In the event the parties are unable to resolve any issues regarding discovery, including depositions, they will present to the Court by January 14, 2022 their respective requests for a pre-motion discovery conference pursuant to Local Rule 37.2 of the Local Rules of the United States District Court for the Southern District of New York in compliance with Section 2 of the Court’s Individual Practices.

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4. The depositions of Plaintiff, Korsinsky, Levi and non-party Svetlana Mayzus will be taken by January 31, 2022.
5. All fact discovery is to be completed by February 28, 2022.
6. Expert discovery is to be completed by April 11, 2022.

We thank Your Honor for the Court's attention to this matter and stand ready to supply such additional information as the Court may request

Respectfully,

/s/Allen B. Roberts

Allen B. Roberts

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cc: All counsel of record via ECF